

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE CONFERENCE of the
NATIONAL ASSOCIATION for the
ADVANCEMENT of COLORED PEOPLE,
on behalf of itself and its members, et al.,

Plaintiffs,

v.

WILLIAM LEE, in his official capacity as
Governor of the State of Tennessee, et al.,

Defendants.

Civil No. 3:20-cv-01039

**JUDGE CAMPBELL
MAGISTRATE JUDGE FRENSLEY**

[Class Action]

**DECLARATION OF VALENCIA RICHARDSON IN SUPPORT OF PLAINTIFFS’
RESPONSE TO DEFENDANT’S MOTION FOR A STAY OF PERMANENT
INJUNCTION PENDING APPEAL**

Pursuant to 28 U.S.C. § 1746, I, Valencia Richardson, declare as follows:

1. I am an attorney representing plaintiffs Tennessee Conference of the National Association for the Advancement of Colored People, Lamar Perry, Curtis Gray Jr, John Weare, Benjamin Tournier, Leola Scott, and Reginald Hendrix. I have been employed by Campaign Legal Center since 2020. I currently serve as Legal Counsel on the voting rights team. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based upon my own personal knowledge. This declaration is submitted in support of plaintiffs’ response to defendant’s motion for a stay of permanent injunction pending appeal.

2. On June 17, 2024, I retrieved a copy of the Fiscal Year 2024-2025 Recommended Budget: Expenditures by Object and Funding by Source for the state of Tennessee at <https://www.tn.gov/content/dam/tn/finance/budget/documents/2025BudgetDocumentVol3.pdf>,

of which a true and correct excerpted copy is attached as Exhibit A, ECF No. 251-2 to this declaration.

3. On or around May 11, 2021, counsel for Defendants served on counsel for Plaintiffs DEF000544-45. A true and correct copy of DEF000544-45 is attached as Exhibit B, ECF No. 251-3.

4. On or around May 11, 2021, counsel for Defendants served on counsel for Plaintiffs DEF000569-70. A true and correct copy of DEF000569-70 is attached as Exhibit C, ECF No. 251-4.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 17th day of June, 2024, in Washington, DC.

/s/ Valencia Richardson

Valencia Richardson